

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
KEBE STUDIOS LLC,

Defendants.

Case No. 1:19-cv-01301-WMR

**PLAINTIFF BELCALIS MARLENIS ALMÁNZAR’S CROSS-MOTION TO
AMEND HER PLEADING AND DEEM HER SECOND AMENDED
COMPLAINT FILED, *NUNC PRO TUNC***

Pursuant to Rule 15, as well as L.R. 15, and in the event that the Court grants the motion of Defendant Latasha Kebe to dismiss the Second Amended Complaint of Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”), Plaintiff hereby moves this Court, through her undersigned counsel, for an order granting Plaintiff’s motion to further amend her Complaint and deem Plaintiff’s Second Amended Complaint (ECF Doc. No. 69) filed, *nunc pro tunc*. This motion is based on the supporting memorandum of law (ECF No. 105) and the Declarations of Sarah M. Matz and Lisa F. Moore, and the record in this case.

Dated: January 15, 2021

Respectfully submitted,

/s/ W. Andrew Pequignot

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CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2021, I electronically filed the foregoing PLAINTIFF BELCALIS MARLENIS ALMÁNZAR'S CROSS-MOTION TO AMEND HER PLEADING AND DEEM HER SECOND AMENDED COMPLAINT FILED, *NUNC PRO TUNC* together with the supporting documents with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/ W. Andrew Pequignot

W. Andrew Pequignot

Georgia Bar No. 424546